

# **M. Premo-Hopkins Decl. Exhibit 13**

**From:** Sarah London <slondon@girardsharp.com>  
**Sent:** Thursday, August 7, 2025 8:34 PM  
**To:** Premo-Hopkins, Mark W.; Rachel B. Adams; Roopal P. Luhana  
**Cc:** Brown, Alli; Vartain, Laura; Davidson, Jessica  
**Subject:** Re: Uber Litigation - Protective Order

**This message is from an EXTERNAL SENDER**

Be cautious, particularly with links and attachments.

Hi Mark, I can chat now and will give you a call. Otherwise I can find a window in the morning tomorrow. Can you let us know what it is you'd like to discuss? Thanks.

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**From:** Premo-Hopkins, Mark W. <mark.premohopkins@kirkland.com>  
**Date:** Wednesday, August 6, 2025 at 6:28 PM  
**To:** Rachel B. Adams <rabrams@peifferwolf.com>, Roopal P. Luhana <luhana@chaffinluhana.com>, Sarah London <slondon@girardsharp.com>  
**Cc:** Brown, Alli <alli.brown@kirkland.com>, Vartain, Laura <laura.vartain@kirkland.com>, Davidson, Jessica <jessica.davidson@kirkland.com>  
**Subject:** RE: Uber Litigation - Protective Order

**EXTERNAL EMAIL**  
MDL Counsel –

Please let us know when you are available for a meet-and-confer by phone tomorrow (Thursdasy) to discuss this issue?

**Mark Premo-Hopkins, P.C.**

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KIRKLAND & ELLIS LLP  
555 California Street, San Francisco  
T 415 439 1910  
M 312 497 6606

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he / him / his  
[mark.premohopkins@kirkland.com](mailto:mark.premohopkins@kirkland.com)

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**From:** William Levin <wlevin@levinsimes.com>  
**Sent:** Tuesday, August 5, 2025 8:30 PM  
**To:** Premo-Hopkins, Mark W. <mark.premohopkins@kirkland.com>; John Eddie Williams <jwilliams@whlaw.com>  
**Cc:** Brooks Cutter <bcutter@cutterlaw.com>; Sarah London <slondon@girardsharp.com>; Roopal Luhana <Luhana@chaffinluhana.com>; Rachel Abrams (Peiffer) <rabrams@peifferwolf.com>; Brown, Alli <alli.brown@kirkland.com>; Vartain, Laura <laura.vartain@kirkland.com>; Davidson, Jessica <jessica.davidson@kirkland.com>  
**Subject:** Re: Uber Litigation - Protective Order

Confirmed. I do not believe anyone working at our firm has communicated with the NY Times at all. I can confirm that no one would, or has, communicated confidential information to the Times.

William Levin

**From:** Premo-Hopkins, Mark W. <[mark.premohopkins@kirkland.com](mailto:mark.premohopkins@kirkland.com)>  
**Sent:** Monday, August 4, 2025 5:16:12 PM  
**To:** John Eddie Williams <[jwilliams@whlaw.com](mailto:jwilliams@whlaw.com)>  
**Cc:** William Levin <[wlevin@levinsimes.com](mailto:wlevin@levinsimes.com)>; Brooks Cutter <[bcutter@cutterlaw.com](mailto:bcutter@cutterlaw.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Rachel Abrams (Peiffer) <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>; Brown, Alli <[alli.brown@kirkland.com](mailto:alli.brown@kirkland.com)>; Vartain, Laura <[laura.vartain@kirkland.com](mailto:laura.vartain@kirkland.com)>; Davidson, Jessica <[jessica.davidson@kirkland.com](mailto:jessica.davidson@kirkland.com)>  
**Subject:** RE: Uber Litigation - Protective Order

Counsel – would each of you (John Eddie, Bill, Brooks, Roopal, Sarah, and Rachel) please specifically confirm that neither your law firms nor anyone acting at your direction or on your behalf communicated confidential information to the New York Times.

**Mark Premo-Hopkins, P.C.**

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**KIRKLAND & ELLIS LLP**  
555 California Street, San Francisco  
T 415 439 1910  
M 312 497 6606

he / him / his  
[mark.premohopkins@kirkland.com](mailto:mark.premohopkins@kirkland.com)

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**From:** John Eddie Williams Jr. <[jwilliams@whlaw.com](mailto:jwilliams@whlaw.com)>  
**Sent:** Monday, August 4, 2025 2:32 PM  
**To:** Premo-Hopkins, Mark W. <[mark.premohopkins@kirkland.com](mailto:mark.premohopkins@kirkland.com)>  
**Cc:** William Levin <[wlevin@levinsimes.com](mailto:wlevin@levinsimes.com)>; Brooks Cutter <[bcutter@cutterlaw.com](mailto:bcutter@cutterlaw.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>; Brown, Alli <[alli.brown@kirkland.com](mailto:alli.brown@kirkland.com)>; Nomellini, Mark J. <[mnomellini@kirkland.com](mailto:mnomellini@kirkland.com)>; Vartain, Laura <[laura.vartain@kirkland.com](mailto:laura.vartain@kirkland.com)>; Davidson, Jessica <[jessica.davidson@kirkland.com](mailto:jessica.davidson@kirkland.com)>  
**Subject:** Re: Uber Litigation - Protective Order

I've spoken with my co-counsel in the JCCP leadership, and none of us have any personal knowledge of any breach of the Protective Order. If you have any solid evidence, we'll be happy to investigate further. As always, we are happy to discuss further.

Sent from my iPad

**John Eddie Williams Jr.**

Managing Partner  
Direct: (713) 230-2330  
[jwilliams@whlaw.com](mailto:jwilliams@whlaw.com)



**Williams Hart & Boundas, LLP**

8441 Gulf Freeway, Suite 600  
Houston, Texas 77017-5051  
(713) 230-2200 Main  
(800) 220-9341  
(713) 643-6226 Fax  
[www.whlaw.com](http://www.whlaw.com)



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On Aug 1, 2025, at 6:23 PM, Premo-Hopkins, Mark W. <[mark.premohopkins@kirkland.com](mailto:mark.premohopkins@kirkland.com)> wrote:

Counsel – please see the attached correspondence regarding the protective order in the Uber matter, and that requires your immediate attention.

**Mark Premo-Hopkins, P.C.**

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555 California Street, San Francisco  
T 415 439 1910  
M 312 497 6606

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he / him / his  
[mark.premohopkins@kirkland.com](mailto:mark.premohopkins@kirkland.com)

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<MPH Ltr to JCCP + MDL Ptf Counsel re NYT.pdf>

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